

EXHIBIT B

CALIFORNIA CIVIL RIGHTS LAW GROUP

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Attorneys for Plaintiff
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No. 3:17-cv-06748-WHO

DEMETRIC DI-AZ, OWEN DIAZ, and
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
CITISTAFF SOLUTIONS, INC.; WEST
VALLEY STAFFING GROUP;
CHARTWELL STAFFING SERVICES, INC.;
and DOES 1-50, inclusive,

Defendants.

**PLAINTIFF OWEN DIAZ'S REQUEST
FOR PRODUCTION OF DOCUMENTS
TO DEFENDANT TESLA, INC. – SET
ONE**

PROPOUNDING PARTY: Plaintiff OWEN DI-AZ

RESPONDING PARTY: Defendant TESLA, INC.

SET NO.: One

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure § 2031.030, Plaintiff
OWEN DIAZ hereby requests that Defendant TESLA, INC. respond to the following Requests
for Production of Documents, Set No. One, separately, fully, and under oath, within thirty (30)

REQUEST FOR PRODUCTION NO. 20

Please produce all DOCUMENTS RELATING TO any discipline imposed as a result of any complaint(s) made by any TESLA employee, contractor and/or agent about the use of the terms “Nigger” or “Nigga” at the TESLA FACTORY.

REQUEST FOR PRODUCTION NO. 21

Please produce all DOCUMENTS detailing complaints of harassment based on race or color against any TESLA employee at the TESLA FACTORY since 2010. (In responding to this request, complaint refers to both employee filed with administrative agencies and in court.)

REQUEST FOR PRODUCTION NO. 22

Please produce the entire investigation files for any complaints of harassment based on race or color made against TESLA or its employees at the TESLA FACTORY since 2010. (In responding to this request, complaint refers to both employee complaints to TESLA and complaints filed with administrative agencies and in court.)

REQUEST FOR PRODUCTION NO. 23

Please produce all race harassment or discrimination policies of TESLA in effect from 2010 to present.

REQUEST FOR PRODUCTION NO. 24

Please produce all DOCUMENTS that discuss TESLA’s procedures for reporting harassment in the workplace from 2010 to present.

REQUEST FOR PRODUCTION NO. 25

Please produce all DOCUMENTS that discuss the procedures for TESLA employees who are investigating complaints of harassment.

REQUEST FOR PRODUCTION NO. 26

Please produce all DOCUMENTS that constitute the policies, procedures, checklists or manuals that are used or relate to TESLA’s Human Resources Department when investigating complaints of race harassment or discrimination from 2010 to present.

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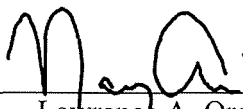
1 REQUEST FOR PRODUCTION NO. 43

2 Please produce all DOCUMENTS that support any defense YOU have pleaded or will
3 plead in this action.

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5 CALIFORNIA CIVIL RIGHTS LAW GROUP

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8 DATED: April 30, 2018

By:

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10 Lawrence A. Organ, Esq.
11 Navruz Avloni, Esq.
12 Attorneys for Plaintiffs
13 DEMETRIC DI-AZ AND OWEN DIAZ
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